

Plaintiffs Gabrielle Stuve, Jessica Nicodemo, Lana Moskowitz, Aaron Clarke and Michelle Francione (“Plaintiffs”), through their counsel, respectfully move this Court for an order consolidating the recently transferred case, *Tarantino v. Kraft Heinz Co.*, 2:21-cv-4013-JMA-JMW (E.D.N.Y.) (the “*Tarantino* action”), with their case pursuant to Fed. R. Civ. P. 42(a).

1. On May 26, 2022, Judge Azrack of the Southern District of New York transferred the *Tarantino* action to the Northern District of Illinois. *See id.* Dkt No. 22.

2. Plaintiffs respectfully submit that the *Tarantino* action should be consolidated into the above-captioned case.

3. The instant action and the *Tarantino* action involve common questions of law and fact, arise from the same events, name the same Defendant, and will involve the same discovery.

Moreover, consolidation under Rule 42(a) will eliminate the possibility of inconsistent rulings on various motions and will conserve judicial and party resources. Plaintiffs intend to file a consolidated amended complaint that includes Ms. Tarantino as a named plaintiff and thus believe consolidation is appropriate. Accordingly, Plaintiffs submit that consolidation is appropriate.

4. By Order dated October 18, 2021, this Court granted Plaintiffs' unopposed motion to stay this case pending the transfer ruling in *Tarantino*. See Dkt. No. 38. Plaintiffs believe that this consolidation of *Tarantino* is appropriate at this time so that all related matters will be properly before this Court.

5. Plaintiffs' counsel has conferred with Defendant's counsel who agrees to the relief requested herein. Plaintiffs' counsel has also conferred with counsel for the plaintiff in the *Tarantino* action, who also agrees to the relief requested herein.

WHEREFORE, Plaintiffs respectfully request the Court grant Plaintiffs' motion to consolidate the *Tarantino* action.

Dated: June 23, 2022

Respectfully submitted,

/s/ Katrina Carroll

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CERTIFICATE OF SERVICE

I, Katrina Carroll, hereby certify that on June 23, 2022, a true and correct copy of the foregoing was served by CM/ECF on all counsel of record.

By: /s/ Katrina Carroll